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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

Anthony Gee # 227493 )  
Plaintiff )

Vs

) Civil Action No  
) 2:06-Cv-262-WKW  
)

James H. Deloach et, al )  
Defendants

Motion For Interrogatories

Comes now the Plaintiff Anthony Gee by and through himself pursuant to Rule 33 (a) Fed \* R \* C \* P (Interrogatories) and moves this court for an order directing Warden James \* H \* Deloach to disclose to the plaintiff or directly to the court the answers to these questions <sup>They</sup> are being asked for the purpose of transferred intent which is to simply supply the necessary intent against the respondents as aforesaid. Sworn to under the penalties of perjury as true and correct. questions as follows

(I) At the time of the incident wasn't I under your custody and care

(II) Did you order a full investigation into the stabbing of the plaintiff I Anthony Gee

(III) If you had the stabbing incident investigated how many ~~of~~ witnesses of the men in the dorm <sup>sup</sup> at the time of the incident how many testified and gave statements to what they heard and seen

(IV) <sup>why</sup> Didn't you have the 8 individuals who was responsible for stabbing Anthony Gee The Plaintiff prosecuted criminally

(V) Do you have Incident reports and medical reports resulting from the plaintiff being stabbed cut, beat and almost killed

(VI) Did you find out exactly what happened and did you find out the names and A#s Number of each Inmate and that Information was placed in the plaintiff Institutional File. that the 8 Inmates were placed on his enemy list and each one was identified in their individual capacity by name, age Race and A#s numbers

(VII) Why didn't you place the plaintiff in protective custody as standard procedure requires

(VIII) Why didn't you speak with anthony Gee and ask him did he wanted to be placed in protective custody

(IX) Do you know [REDACTED] [REDACTED] It's a constitutional violation to place the plaintiff back in the same cell block <sup>sup</sup> with the same inmates who just recently tried to kill him without signing a living agreement

(X) Isn't it standard policy when an inmate is almost killed whether the inmates consent or not to place that Injured Inmate in protective custody for security reason and for the safety of the inmates who tried to kill me the plaintiff

(XI) Did any of your staff members ask the plaintiff did he want to be placed in protective custody and he signed consent form stating they had a living agreement amongst each other.

<sup>\*</sup>IXII) Isn't it your job as Warden to make sure that all inmates in your custody are kept from harm of other inmates and officers

<sup>\*</sup>IXIII) Why do you allow one officer to work the disciplinary modification dormitory where there's unruly and aggressive inmates who need constant guard supervision at all times why

<sup>\*</sup>IXIV) Was there one officer working the disciplinary modification dormitory on the day the plaintiff was severely beat stabbed and cut in and about his body

<sup>\*</sup>IXV) Why was anthony Gee placed back in the same dormitory where 8 inmates had just recently attempted to murder. Why didn't you or a staff member have anthony Gee placed in protective custody instead of back in harms way isn't that a direct cause of negligence on the Ala Dept of corrections Warden James H. Deloach and his staff members for creating a health and security hazard by placing him back in harms way in sup the dorm he was recently almost killed in.

<sup>\*</sup>IXVI) When the incident occurred by you being Warden if a inmate got very serious injuries and almost lose his life do your staff immediately notify you personally of the situation and were you notified personally and what were your actions upon notification of the stabbing incident of Anthony Gee.

<sup>\*</sup>IXVII) Do you have any type of documents of the complete incident stabbing from the time of the incident occurred and complete reports of who the 8 inmates were who attacked anthony Gee and further documents that anthony Gee was placed in protective custody as a direct result of the stabbing.

## CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the above and foregoing upon attorneys of record for the defendants, to-wit General Counsel, Alabama Department of Corrections, P.O. Box 301501\* Montgomery\* Alabama 36101, by placing a copy of the same in the United States Mail Postage prepaid and properly addressed on this 24<sup>th</sup> day of April, 2006.

Anthony Gue  
Anthony Gue # 227493